

8/28/2006

Responses to Comments on Draft RML IRF Emergency Response Plan

**Letter #3**

Confab

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June 30, 2006

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Dear Mr. Lankford,

We have reviewed the Integrated Research Facility Emergency Response Plan and would like to offer several recommendations to improve its effectiveness and responsiveness to citizens of Ravalli County.

First of all, we are pleased with the thoroughness with which most of the plan has been crafted. The plan deals with a specialized and complex set of variables that must be addressed. Citizens must feel confident that their safety is secured in the event that an emergency should arise from activities related to Rocky Mountain Laboratories (RMLs) program. Citizens must feel confident that local government services can adequately respond when a public health emergency occurs and, also, that local government resources are not unduly saddled with costs and liability associated with addressing the specialized needs of an emergency originating from the RMLs.

1. Specifically, on page 53 in the section titled "Operations of the RML BEAP" the Plan states:

*"In the event that the RML Infectious Disease Adviser determines that an incident poses a public health hazard, management of the patient(s) and any other potentially affected individuals is referred to the Ravalli County Public Health Nursing Department. The Department, along with the Ravalli County Disaster and Emergency Services, will activate the local Emergency Operations Center and the local National Incident Management System according to provisions of the Public Health Annex of the Ravalli County Emergency Operations Guidelines."*

Rocky Mountain Laboratories cannot simply refer the situation to the Ravalli County Public Health Nursing Department. The Emergency Response Plan needs to clearly document RMLs continuing role and responsibilities in the event of a public health

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hazard. This information needs to be provided prior to operating the Integrated Research Facility so citizens have confidence that their safety is reasonably secure and their local government interests are protected.

***[R3.1] This comment is virtually identical in content to WVE comment # 1. Please see the response (R2.1) to that comment.***

2. Also on page 49, on a related concern, the Plan states:

*“Emergency care will be provided to visitors and contract personnel who sustain a potential exposure. These individuals will be referred to their private or company physicians for follow-up”*

Again RMLs has a responsibility to actively offer assistance to, track, and monitor the condition of any contract employees or visitors who have a potential exposure. The procedures need to be thoroughly documented in this Plan.

***[R3.2] This comment is virtually identical to WVE comment # 20. Please see the response (R2.21) to that comment.***

3. This Plan can be strengthened by citizens’ understanding of it and their confidence in it. We believe residents in RMLs surrounding neighborhood have much at stake in the efficacy of an Emergency Plan. We urge RMLs to actively engage residents in a discussion of this Plan and thereby gain needed support and cooperation.

***[R3.3] This comment relates to NIH/RML’s efforts to make the IRF ERP available to the public and the surrounding neighborhood. NIH/RML went to extensive efforts to publicize the plan and to engage the community. These efforts are detailed in the general introductory response.***

Thank you for the opportunity to comment. If we may provide any other detail or information, please do not hesitate to contact Kristine at 406/375-9953 or by e-mail at [kk@confabmt.net](mailto:kk@confabmt.net) and Dave at 406/ 381-2355 or [ds@confabmt.net](mailto:ds@confabmt.net).

Very truly yours,

Kristine Komar

Dave Schultz